

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

KAIFI LLC,
Plaintiff,
v.
T-MOBILE US, INC., ET AL.
Defendants.

Case No. 2:20-cv-00281-JRG

JURY TRIAL DEMANDED

Honorable Rodney Gilstrap

**JOINT NOTICE
PURSUANT TO COURT ORDER
REGARDING T-MOBILE MOTION (DKT. 140)**

At the September 27, 2021 hearing, on T-Mobile's motion at Dkt. 140, the Court ordered KAIFI counsel to inquire whether Intellectual Discovery would be willing to voluntarily search its emails in connection with resolving T-Mobile's motion.

In response to KAIFI counsel's inquiry, Intellectual Discovery provided a proposal, which was conveyed to T-Mobile on Friday, October 1, 2021.

T-Mobile is conferring with its counsel, and asked for time to respond by Monday, October 4, 2021. KAIFI agrees that timing is sensible.

Date: October 1, 2021

/s/ Robert Christopher Bunt

Robert Christopher Bunt
Texas Bar No. 00787165
PARKER, BUNT & AINSWORTH PC
100 E. Ferguson St., Suite 418
Tyler, Texas 75702
Telephone: (903) 531-3535
Email: rcbunt@pbatyler.com

Jason G. Sheasby
Cal. Bar No. 205455 (admitted *pro hac vice*)
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067-4276
Telephone: (310) 277-1010
Facsimile: (310) 203-7199
Email: jsheasby@irell.com

Andrew Y. Choung
Cal. Bar No. 203192 (admitted in E.D. Texas)
NIXON PEABODY LLP
300 S. Grand Avenue, Suite 4100
Los Angeles, CA 90071
Telephone: (213) 629-6166
Facsimile: (213) 629-6001
Email: achoung@nixonpeabody.com

Enoch H. Liang
Cal. Bar No. 212324 (admitted in E.D. Texas)

LTL ATTORNEYS LLP
300 S. Grand Ave., 14th Fl.
Los Angeles, California 90071
Telephone: (213) 612-8900
Facsimile:(213) 612-3773
Email: enoch.liang@ltlattorneys.com

Attorneys for Plaintiff KAIFI LLC

Date: October 1, 2021

/s/ Josh A. Krevitt (with permission)

Josh A. Krevitt
New York Bar No. 2568228
Benjamin Hershkowitz
New York State Bar No. 2600559
Katherine Q. Dominguez
New York Bar No. 4741237
Paul J. Kremer
New York Bar No. 4900338
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166-0193
Telephone: (212) 351-4000
Facsimile: (212) 351-4035
jkrevitt@gibsondunn.com
bhershkowitz@gibsondunn.com
kdominguez@gibsondunn.com
pkremer@gibsondunn.com

Robert Vincent
Texas State Bar No. 24056474
Nathan R. Curtis
Texas State Bar No. 24078390
Audrey Yang
Texas State Bar No. 24118593
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue
Dallas, Texas 75201-2923
Telephone: (214) 698-3100
Fax: (214) 571-2900
rvincent@gibsondunn.com
ncurtis@gibsondunn.com
ayang@gibsondunn.com

Melissa R. Smith
Texas State Bar No. 24001351
GILLIAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: 903.934.8450
Facsimile: 903.934.9257
melissa@gilliamsmithlaw.com

*Counsel for Defendants T-Mobile US, Inc. and
T-Mobile USA, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served via electronic mail on October 1, 2021 to all opposing counsel of record.

/s/ Robert Christopher Bunt _____
ROBERT CHRISTOPHER BUNT